

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ANN COYLE,)	
on behalf of herself and others similarly situated,)	
)	
Plaintiff,)	
)	Case No. 08-CV-03407
v.)	
)	Chief Judge James F. Holderman
AVENT AMERICA, INC., et al.,)	
)	
Defendants.)	

DEFENDANT HANDI-CRAFT COMPANY'S
UNOPPOSED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFFS' COMPLAINT

Defendant Handi-Craft Company ("Handi-Craft"), by its undersigned counsel, requests an extension of time to answer or otherwise respond to plaintiffs' Complaint subject to a decision on the Motion for Transfer and Consolidation pending before the Judicial Panel on Multidistrict Litigation ("JPML").

In support of its motion, Handi-Craft states the following.

1. On June 13, 2008, plaintiffs served their Notice of Lawsuit and Request for Waiver of Service of Summons on Handi-Craft.
2. This case is one of more than twenty putative class actions currently the subject of a Motion for Transfer pending before the JPML. To the best of Handi-Craft's information and belief, all parties to the putative class actions agree that the cases should be consolidated for pretrial proceedings pursuant to 28 U.S.C. §1407. Briefing on the Motion for Transfer is complete, and no party has opposed consolidation and transfer.
3. The JPML heard oral argument on the Motion for Transfer on July 31, 2008.

4. Plaintiffs' counsel agree that defendants (including Handi-Craft) should have until thirty days following the entry of a ruling on the Motion for Transfer by the JPML to answer or otherwise respond to plaintiffs' Complaint.

5. Extending the time within which Handi-Craft must file its responsive pleading in this case will promote efficiency for the parties and the Court.

WHEREFORE, defendant Handi-Craft Company requests that the Court extend the deadline for Handi-Craft to answer or otherwise respond to plaintiffs' Complaint until thirty days after the entry of a ruling by the JPML on the pending Motion for Transfer.

Dated: August 12, 2008

s/John F. Kinney

One of the Attorneys for
Defendant Handi-Craft Company

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 12th day of August, 2008, the foregoing **Defendant Handi-Craft Company's Unopposed Motion for Extension of Time to Answer or Otherwise Respond to Plaintiffs' Complaint and Notice of Motion** were electronically filed with the Clerk of the Court by using the ECM/ECF system which will send a notice of electronic filing to the following:

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s/John F. Kinney

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